

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed September 1, 2005. At the time of the Office Action, Claims 1, 4, 5, and 13 were pending in this Application. Claims 2-3 and 6-12 were previously canceled by Applicants without prejudice or disclaimer. Claims 1, 4, 5, and 13 were rejected. Claim 1 has been amended to further define various features of Applicants' invention. Applicants respectfully request reconsideration and favorable action in this case.

Rejections under 35 U.S.C. §103

Claims 1 and 4-5 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 6,336,124 issued to Hassan Alam et al. ("Alam") in view of AutoCAD Release 12 dated June 12, 1992 ("AutoCAD"), and further in view of U.S. Patent 6,732,191 issued to Richard A. Baker et al. ("Baker."). Applicants respectfully traverse and submit the cited art combinations, even if proper, which Applicants do not concede, does not render the claimed embodiment of the invention obvious.

In order to establish a *prima facie* case of obviousness, the references cited by the Examiner must disclose all claimed limitations. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974).

Independent Claim 1 recites, among other limitations, a "conversion apparatus for converting the automation project data into a defined standardized meta data format having a hierarchy of data comprising a plurality of folders" Additionally, Independent Claim 1 recites that the automation project data in question is "in a proprietary automation project data format" prior to conversion.

Examiner cites to Alam for teaching the conversion of data from a proprietary format into a standard meta format. Applicants submit that while Alam teaches the conversion of data in proprietary formats such as PDF, RTF, HTML, XML, CSS, TIFF, GIF, BMP, JPET, etc., the claimed invention is directed to the conversion of automation project data that is in a proprietary automation project data format. Claim 1 has been amended to clarify this distinction. Applicants respectfully submit that Alam (as well as AutoCAD and Baker) fail to

disclose, teach or suggest the conversion of automation project data stored within a proprietary automation project data format.

Additionally, Independent Claim 1 recites that the automative project data is converted into “a defined standardized meta data format having a hierarchy of data comprising a plurality of folders” Applicants submit that neither Alam, AudoCAD nor Baker discloses, teaches or suggests converting data into a meta data format with a hierarchy of folders as recited.

Alam, AudoCAD and Baker fail to render obvious the claim invention because these references, considered separately or in combination, fail to teach each and every limitation of Independent Claim 1. Applicants request reconsideration, withdrawal of the §103 rejections and full allowance of Independent Claim 1 and Claims 4, 5 and 13 which depend therefrom.

CONCLUSION

Applicants have now made an earnest effort to place this case in condition for allowance in light of the amendments and remarks set forth above. Applicants respectfully request reconsideration of the claims as amended.

Applicants believe there are no fees due at this time, however, the Commissioner is hereby authorized to charge any fees necessary or credit any overpayment to Deposit Account No. 50-2158 of Baker Botts L.L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicants' attorney at 512.322.2545.

Respectfully submitted,
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